

EXHIBIT 1

From: [Geyer, Kate](#)
To: [Donald McPhail](#); [Eric W. Schweibenz](#)
Cc: [Machleidt, Dario](#); [Damitio, Chris](#)
Subject: Valve v. Rothschild, et al. - Defendants' Failure to Serve ESI Disclosures Under Section C.2.a.i
Date: Thursday, July 25, 2024 3:06:44 PM
Attachments: [image001.png](#)

Counsel:

We did not receive Defendants' disclosures of the "data sources (including custodians), search terms and queries, any file type and data restrictions, and any other methodology that" Defendants propose to use to locate ESI likely to contain responsive and discoverable information to Plaintiff's first set of requests for production, that were required to be disclosed on July 23 under the Court's ESI Order. Dkt. 51, § C.2.a.i. Please provide this information today. We are concerned with Defendants' emerging pattern of missing Court deadlines that it previously agreed to. We expect Defendants to "conduct[] discovery in a cooperative manner" going forward, including complying with the Court's deadlines, so we can avoid Court intervention. *Id.* § A.1.



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